

EXHIBIT G

From: Shannon Hayden
To: Gregory Jordan; Stephen Stern
Cc: Brian Tollefson; Thomas J. Gagliardo
Subject: RE: David Boshea Texts
Date: Tuesday, February 6, 2024 3:27:00 PM
Attachments:

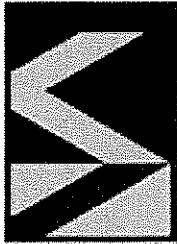
image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png
image009.png
image010.png
image011.png
image012.png
image013.png
image014.png
image015.png
image016.png
image017.png
image018.png
image019.png
image020.png
image021.png
image022.png
image023.png
image024.png
image025.png
image026.png
image027.png
image028.png
image029.png
image030.png
image031.png
image032.png
image033.png
image034.png
image035.png
image036.png
image037.png
image038.png
image039.png
image040.png
image041.png
image042.png
image043.png
image044.png
image045.png
image046.png
image047.png
image048.png
image049.png
image050.png
image051.png
image052.png

Great. You might want to send Mr. Boshea this article as it can explain to him how his iPhone works and how screenshotting is simply pressing two buttons at the same time.

<https://support.apple.com/guide/iphone/take-a-screenshot-iphc872c0115/ios>

When can we expect the emails that Mr. Boshea did not produce?

Shannon M. Hayden / Attorney
hayden@kaganstern.com
Kagan Stern Marinello & Beard, LLC



**KAGAN
STERN**

(410) 216-7900, ext. 1018
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Gregory Jordan <gjordan@jz-llc.com>
Sent: Tuesday, February 6, 2024 3:23 PM
To: Shannon Hayden <hayden@kaganstern.com>; Stephen Stern <Stern@kaganstern.com>
Cc: Brian Tollefson <brian@tollefsonip.com>; Thomas J. Gagliardo <tgagliardo@gelawyer.com>
Subject: David Boshea Texts

I have spoken with David. The person at the AT&T store with whom he worked to obtain the texts was out until today. David is going to AT&T and hopes to have the texts later today.

Gregory J. Jordan
Licensed in Illinois and Indiana
Jordan & Zito LLC
350 North LaSalle Street, Suite 1100
Chicago Illinois 60654
(312) 854-7181 (Office)
(312) 543-7354 (Cellular)
gjordan@jz-llc.com

****Notice from Jordan & Zito LLC ****

To comply with United States Treasury regulations, I advise you that any discussion of Federal tax issues in this communication was not intended or written to be used and cannot be used by any person (a) to avoid penalties that may be imposed by the Internal Revenue Service, or (b) to promote, market or recommend to another party any matter addressed herein. This Internet message may contain information that is privileged, confidential, and exempt from disclosure. It is intended for use only by the person to whom this sender addressed the email. Please do not forward or use this information if you have received this in error. If an error has occurred, contact me immediately. I do not intend that my information block, typed name, or anything else in this message constitutes my electronic signature unless I make a specific statement contrary to this message.

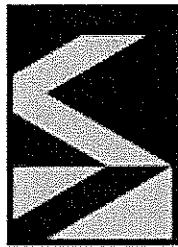
Jordan & Zito LLC

From: Shannon Hayden <hayden@kaganstern.com>
Sent: Tuesday, February 6, 2024 12:42 PM
To: Gregory Jordan <gjordan@jz-llc.com>; Stephen Stern <Stern@kaganstern.com>
Cc: Brian Tollefson <brian@tollefsonip.com>; Thomas J. Gagliardo <tgagliardo@gelawyer.com>
Subject: RE: David Boshea Texts

Greg,

I am following up on my previous email because we still have not received any supplemental documents from Mr. Boshea. These documents should have already been produced in the January 22nd or January 26th productions. Please produce the requested documents by tomorrow morning, so that we do not have to seek court intervention.

Thank you.



**KAGAN
STERN**

Shannon M. Hayden / Attorney
hayden@kaganstern.com
Kagan Stern Marinello & Beard, LLC
(410) 216-7900, ext. 1018
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Shannon Hayden
Sent: Friday, February 2, 2024 4:29 PM
To: 'Gregory Jordan' <gjordan@jz-llc.com>; Stephen Stern <Stern@kaganstern.com>
Cc: Brian Tollefson <brian@tollefsonip.com>; Thomas J. Gagliardo <tgagliardo@gelawyer.com>
Subject: RE: David Boshea Texts

Greg,

Understood, but do let us know as soon as possible if Mr. Boshea plans to produce the text messages that his previous production failed to include.

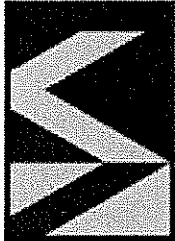
Additionally, we still have not received the email that I referenced in my email to you last Friday. As a reminder, there is a text message dated July 27 at 12:38 PM between David Boshea and Michael White. It contains a text message from Michael stating "I just emailed you back a couple of thoughts buddy. Jorden's re-sponse looks amazing actually. I think stern is going to have to sit down after he gets hit over the head with Jor-den's response."

Please produce this email. If Mr. Boshea has deleted this email, please confirm that.

Further, David Boshea emailed Michael White and cc'ed you on May 30, 2023. The subject line of the email is "client sales." Mr. Boshea asked Michael White "Do you have sales reports for 2019 and 2020? THX." See attached. Seeing as how Michael White was providing Mr. Boshea with Compass Marketing documents the day before (CMI Income email), it seems unlikely that Michael White would not reply to this email and attach the document(s) that Mr. Boshea was seeking. Please produce Michael White's response to this email to you and Mr. Boshea.

Also, Mr. Boshea testified that the email with the subject "revision trial prep" was not the first email and that either Daniel or Michael White revised Mr. Boshea's document entitled "Compass Trial Preparation." Please produce the email(s) related to this.

Thank you.



**KAGAN
STERN**

Shannon M. Hayden / Attorney
hayden@kaganstern.com
Kagan Stern Marinello & Beard, LLC
(410) 216-7900, ext. 1018
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Gregory Jordan <gjordan@jz-llc.com>
Sent: Friday, February 2, 2024 2:19 PM
To: Shannon Hayden <hayden@kaganstern.com>; Stephen Stern <Stern@kaganstern.com>
Cc: Brian Tollefson <brian@tollefsonip.com>; Thomas J. Gagliardo <tgagliardo@gelawyer.com>
Subject: David Boshea Texts

I will reach out to David, but I do not have time to speak with him today.

Gregory J. Jordan
Licensed in Illinois and Indiana
Jordan & Zito LLC
350 North LaSalle Street, Suite 1100
Chicago Illinois 60654
(312) 854-7181 (Office)
(312) 543-7354 (Cellular)
gjordan@jz-llc.com

****Notice from Jordan & Zito LLC ****

To comply with United States Treasury regulations, I advise you that any discussion of Federal tax issues in this communication was not intended or written to be used and cannot be used by any person (a) to avoid penalties that may be imposed by the Internal Revenue Service, or (b) to promote, market or recommend to another party any matter addressed herein. This Internet message may contain information that is privileged, confidential, and exempt from disclosure. It is intended for use only by the person to whom this sender addressed the email. Please do not forward or use this information if you have received this in error. If an error has occurred, contact me immediately. I do not intend that my information block, typed name, or anything else in this message constitutes my electronic signature unless I make a specific statement contrary to this message.

Jordan & Zito LLC

From: Shannon Hayden <hayden@kaganstern.com>

Sent: Friday, February 2, 2024 12:35 PM

To: Gregory Jordan <gjordan@jz-llc.com>; Stephen Stern <Stern@kaganstern.com>

Cc: Brian Tollefson <brian@tollefsonip.com>; Thomas J. Gagliardo <tgagliardo@gelawyer.com>

Subject: RE: David Boshea Texts

Greg,

We have had an opportunity to review the entirety of the text messages that David Boshea produced on Friday, January 26th. It appears that David Boshea did not produce all of his messages with Michael White regarding this lawsuit. We have gone through and noted which messages are missing from the production, both in the text of the email below and marked in the attached document.

For reference, when you produced David Boshea's text messages via email, they were pictures imbedded into the email (rather than a separate document, like a PDF). They appear to go in reverse chronological order, so when I printed out the messages, I organized them chronologically. You will see in the attachment that the first page of the PDF is identified as page 52 on the bottom. When I refer to a page number, I am referring to the page number on the bottom of the PDF and not the PDF pagination (Ex. page 51 is actually page 2 of the PDF). Also, to make it easier, I tabbed the missing messages in with an orange arrow.

Page 52: David Boshea's first text message to Michael White is cut off. The last sentence of the message is "Thx big guy!"

Page 51: David Boshea's first text message is cut off. The last sentence of the message is "Thx bro for always having my back !"

Page 48: Michael White's text message is cut off – the only word that appears is "noon."

Page 42: On Sunday August 6, 2023, David Boshea texted Michael White "Hey buddy. Hope ur well. . . Hey shot u a email." In David Boshea's January 22, 2024 production we did not receive an email from David Boshea to Michael White dated on or around August 6, 2023.

Page 41: There was a text message (or text messages) not produced from Monday August 14th between Michael White and David Boshea. I know the iMessage still existed at the time that Mr. Boshea screenshotted the texts because Apple does not insert a date into an iMessage thread unless there has been new activity.

Page 35: David Boshea's first message on page 35 is cut off. The message ends with "Sounded like Greg's note said u were talking to Scott."

Page 27: David Boshea's message to Michael White is cut off.

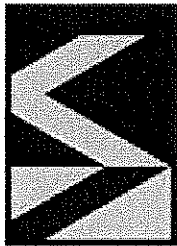
Page 23: David Boshea's first message to Michael White is cut off. Also, David Boshea texts Michael White on October 15, 2023 stating "Just emailed you." We did not receive this email in David

Boshea's January 22, 2024 document production.

Please produce these messages. If Mr. Boshea no longer has these messages, please confirm that he has deleted them.

Also, regarding the text messages you produced last week between you and Daniel White. There appears to be an almost one-year gap. Can you confirm that there were no additional text messages between you and Daniel White from June 15, 2022 to June 1, 2023.

Thank you.



**KAGAN
STERN**

Shannon M. Hayden / Attorney
hayden@kaganstern.com
Kagan Stern Marinello & Beard, LLC
(410) 216-7900, ext. 1018
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Shannon Hayden

Sent: Tuesday, January 30, 2024 1:51 PM

To: Gregory Jordan <gjordan@jz-llc.com>; Stephen Stern <Stern@kaganstern.com>

Cc: Brian Tollefson <brian@tollefsonip.com>; Thomas J. Gagliardo <tgagliardo@gelawyer.com>

Subject: RE: David Boshea Texts

Greg,

Both you and David Boshea received an email from Michael White on May 29, 2023 at 4:15 PM. David was the "To:" recipient (sent to djboshea@outlook.com) and you were cc'ed on the email. The subject of that email was "CMI Income." The text of that email states as follows:

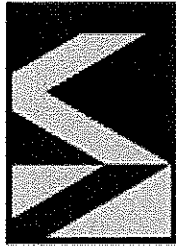
Dave,

As requested

mrw

While you produced later iterations of this email, we never received the email from Michael to you and David. Please produce it as well as the other email that I referenced to you in my email last Friday. If Mr. Boshea no longer has these emails, please confirm that.

Thank you.



**KAGAN
STERN**

Shannon M. Hayden / Attorney
hayden@kaganstern.com
Kagan Stern Marinello & Beard, LLC
(410) 216-7900, ext. 1018
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Shannon Hayden

Sent: Friday, January 26, 2024 5:01 PM

To: 'Gregory Jordan' <gjordan@jz-llc.com>; Stephen Stern <Stern@kaganstern.com>

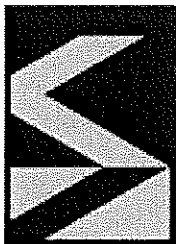
Cc: Brian Tollefson <brian@tollefsonip.com>; Thomas J. Gagliardo <tgagliardo@gelawyer.com>

Subject: RE: David Boshea Texts

Greg,

I am conducting a cursory review of the text messages just produced by Mr. Boshea. There is a text message dated July 27 at 12:38 PM, which appears to be between David Boshea (in blue) and Michael White (in black). See attached. It contains a text message from Michael stating "I just emailed you back a couple of thoughts buddy. Jorden's re-sponse looks amazing actually. I think stern is going to have to sit down after he gets hit over the head with Jor-den's response." The message states that Michael emailed David. We did not receive this email in David Boshea's supplemental document production on January 22, 2024. Please produce this email.

Thank you.



**KAGAN
STERN**

Shannon M. Hayden / Attorney
hayden@kaganstern.com
Kagan Stern Marinello & Beard, LLC
(410) 216-7900, ext. 1018
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Gregory Jordan <gjordan@jz-llc.com>
Sent: Friday, January 26, 2024 3:41 PM
To: Stephen Stern <Stern@kaganstern.com>
Cc: Shannon Hayden <hayden@kaganstern.com>; Brian Tollefson <brian@tollefsonip.com>; Thomas J. Gagliardo <tgagliardo@gelawyer.com>
Subject: David Boshea Texts

Second of three emails containing David Boshea's texts.

Gregory J. Jordan
Licensed in Illinois and Indiana
Jordan & Zito LLC
350 North LaSalle Street, Suite 1100
Chicago Illinois 60654
(312) 854-7181 (Office)
(312) 543-7354 (Cellular)
gjordan@jz-llc.com

****Notice from Jordan & Zito LLC ****

To comply with United States Treasury regulations, I advise you that any discussion of Federal tax issues in this communication was not intended or written to be used and cannot be used by any person (a) to avoid penalties that may be imposed by the Internal Revenue Service, or (b) to promote, market or recommend to another party any matter addressed herein. This Internet message may contain information that is privileged, confidential, and exempt from disclosure. It is intended for use only by the person to whom this sender addressed the email. Please do not forward or use this information if you have received this in error. If an error has occurred, contact me immediately. I do not intend that my information block, typed name, or anything else in this message constitutes my electronic signature unless I make a specific statement contrary to this message.

Jordan & Zito LLC

From: Dave Dave <dave555666@icloud.com>
Sent: Friday, January 26, 2024 2:20 PM
To: Gregory Jordan <gjordan@jz-llc.com>
Subject: Rest of the texts